

BOIES SCHILLER FLEXNER LLP

David Boies (admitted *pro hac vice*)
 333 Main Street
 Armonk, NY 10504
 Tel.: (914) 749-8200
 dboies@bsfllp.com

Mark C. Mao, CA Bar No. 236165
 Beko Reblitz-Richardson, CA Bar No. 238027
 44 Montgomery St., 41st Floor
 San Francisco, CA 94104
 Tel.: (415) 293-6800
 mmao@bsfllp.com
 brichardson@bsfllp.com

James Lee (admitted *pro hac vice*)
 Rossana Baeza (admitted *pro hac vice*)
 100 SE 2nd St., 28th Floor
 Miami, FL 33131
 Tel.: (305) 539-8400
 jlee@bsfllp.com
 rbaeza@bsfllp.com

Alison L. Anderson, CA Bar No. 275334
 M. Logan Wright, CA Bar No. 349004
 725 S. Figueroa St., 31st Floor
 Los Angeles, CA 90017
 Tel.: (213) 629-9040
 alanderson@bsfllp.com

Attorneys for Plaintiffs

SUSMAN GODFREY L.L.P.

Bill Carmody (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
 1301 Avenue of the Americas, 32nd Floor
 New York, NY 10019
 Tel.: (212) 336-8330
 bcarmody@susmangodfrey.com
 srabin@susmangodfrey.com
 sshepard@susmangodfrey.com
 afrawley@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel.: (310) 789-3100
 abonn@susmangodfrey.com

MORGAN & MORGAN

John A. Yanchunis (admitted *pro hac vice*)
 Ryan J. McGee (admitted *pro hac vice*)
 201 N. Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel.: (813) 223-5505
 jyanchunis@forthepeople.com
 rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805
 711 Van Ness Ave, Suite 500
 San Francisco, CA 94102
 Tel.: (415) 358-6913
 mram@forthepeople.com

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
 JULIAN SANTIAGO, and SUSAN LYNN
 HARVEY, individually and on behalf of all other
 similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-4688-RS

**PLAINTIFFS' ADMINISTRATIVE
 MOTION TO CONSIDER WHETHER
 ANOTHER PARTY'S MATERIAL
 SHOULD BE SEALED**

Judge: Hon. Richard Seeborg
 Trial Date: August 18, 2025
 Time: 9:00 a.m.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's material should be sealed. The material is included within Plaintiffs' Oppositions to Google's Motions *in Limine*.

Document or Portion of Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing
Exhibit B – Excerpts of Deposition of Eric Miraglia	Google	Entirety	Material Designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order
Exhibit D – Plaintiffs’ list of page and line references identifying the discovery designations of Google’s Responses to Plaintiffs’ Interrogatories and Requests for Admissions	Google	Entirety	Material Designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order
Exhibit E – Excerpts of Google’s Responses to Plaintiffs’ Interrogatories and Requests for Admissions	Google	Entirety	Material Designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: August 14, 2025

Respectfully submitted,

By: /s/ Mark Mao

Mark C. Mao (CA Bar No. 236165)

mcao@bsfllp.com

Beko Reblitz-Richardson (CA Bar No. 238027)

brichardson@bsfllp.com

BOIES SCHILLER FLEXNER LLP

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

Telephone: (415) 293-6800
Facsimile (415) 293-6899

David Boies (*pro hac vice*)
dboies@bsfllp.com
BOIES SCHILLER FLEXNER LLP
333 Main Street
Armonk, NY 10504
Telephone: (914) 749-8200
Facsimile: (914) 749-8300

James Lee (*pro hac vice*)
jlee@bsfllp.com
Rossana Baeza (*pro hac vice*)
rbaeza@bsfllp.com
BOIES SCHILLER FLEXNER LLP
100 SE 2nd Street, Suite 2800
Miami, FL 33131
Telephone: (305) 539-8400
Facsimile: (305) 539-1307

Alison L. Anderson (CA Bar No. 275334)
alanderson@bsfllp.com
M. Logan Wright (CA Bar No. 349004)
mwright@bsfllp.com
BOIES SCHILLER FLEXNER LLP
725 S. Figueroa St., 31st Floor
Los Angeles, CA 90017
Telephone: (213) 629-9040
Facsimile: (213) 629-9022

Bill Carmody (*pro hac vice*)
bcarmody@susmangodfrey.com
Shawn J. Rabin (*pro hac vice*)
srabin@susmangodfrey.com
Steven Shepard (*pro hac vice*)
sshepard@susmangodfrey.com
Alexander P. Frawley (*pro hac vice*)
afrawley@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330
Facsimile: (212) 336-8340

Amanda Bonn (CA Bar No. 270891)
abonn@susmangodfrey.com

1 SUSMAN GODFREY L.L.P.
2 1900 Avenue of the Stars, Suite 1400
3 Los Angeles, CA 90067
4 Telephone: (310) 789-3100
5 Facsimile: (310) 789-3150

6 John A. Yanchunis (*pro hac vice*)
7 jyanchunis@forthepeople.com
8 Ryan J. McGee (*pro hac vice*)
9 rmcgee@forthepeople.com
10 MORGAN & MORGAN, P.A.
11 201 N Franklin Street, 7th Floor
12 Tampa, FL 33602
13 Telephone: (813) 223-5505
14 Facsimile: (813) 222-4736

15 Michael F. Ram (CA Bar No. 238027)
16 mram@forthepeople.com
17 MORGAN & MORGAN, P.A.
18 711 Van Ness Avenue, Suite 500
19 San Francisco, CA 94102
20 Telephone: (415) 358-6913
21 Facsimile: (415) 358-6923

22 *Attorneys for Plaintiffs*
23
24
25
26
27
28